

# **Prioritized Area Plan for Industrial and Commercial Facility and Activity Inspections**

Under the requirements of the MS4 NPDES Permit issued to the Hawaii Department of Transportation, Highways Division (HDOT Highways) effective March 31, 2006, Part D.1.g.(3), the HDOT Highways is required to submit a Prioritized Area Plan for Industrial and Commercial Facility and Activity Inspections.

## **BACKGROUND**

This program is part of the Industrial and Commercial Activities Discharge Management Program indicated in the Oahu Storm Water Management Program Plan (Oahu SWMP Plan).

Storm water flowing from industrial and commercial areas may be a significant source of pollutants that enter the Oahu MS4. Therefore, the Industrial and Commercial Discharge Management Program (Industrial Discharge Program) is designed to reduce, to the maximum extent practicable, the discharge of pollutants from industrial and commercial facilities and activities that discharge into the Oahu MS4.

## **DATABASE INVENTORIES**

A GIS database of industrial and commercial facilities has been compiled and will be maintained as part of the HDOT Highways Asset Management System (AMS) program. Chapter Ten of the Oahu SWMP Plan provides a detailed description of how the database was developed and the types of facilities and activities included in the inventory.

## **PRIORITIZATION OF AREAS FOR INSPECTION**

Industrial and commercial facilities identified in the inventory were ranked according to the relative risk that any discharge may be contaminated with pollutants, and how this might affect the quality of storm water runoff entering the Oahu MS4.

Priority areas are delineated by watershed. Based on the information collected and analyzed using the AMS, priority areas for inspection were identified during the development of the prioritized list of parcels. The following types of sites or facilities were screened from the list of parcels:

- Owned by the federal, State and City governments;
- Listed in the 2000 Questionnaire Survey roster (see Oahu SWMP Plan Section 6.2.1); and
- Not directly adjacent to HDOT Highways rights-of-way.

Following the screening, the remaining facilities or sites were sorted by which watersheds they are located. The sites located in watersheds with Waste Load Allocations (WLAs) (see Chapter Eleven of the Oahu SWMP Plan) were given the highest priority. The sites located in high-priority watersheds (as defined in Appendix A

of the Consent Decree (Civil Action No. CV05-00636)) were given the second highest priority. The sites located in non-WLA or non-High Priority Watersheds were given the lowest priority. Watersheds within each priority level were then ranked based on their site or facility densities. Those watersheds that had the most sites or facilities were ranked or prioritized as first. The resulting prioritized areas are provided in Table 1.

**Table 1**  
**Prioritized Areas for Inspection**

<b>Priority</b>	<b>Area</b>
1	Ala Wai Watershed
2	Waimanalo Watershed
3	Kaelepulu Watershed
4	Kawa Watershed
5	Nuuanu Watershed
6	Kaukonahua Watershed
7	Halawa Watershed
8	Kapakahi Watershed
9	Waikele Watershed
10	Waimalu Watershed
11	Kalauao Watershed
12	Kawainui Watershed
13	Kalihi Watershed
14	Kaneohe Watershed
15	Waiawa Watershed
16	Aiea Watershed
17	Poamoho Watershed
18	Kiikii Watershed
19	Mailili Watershed
20	Kapalama Watershed
21	Kaupuni Watershed
22	Manoa-Palolo Watershed
23	Waialaenui Watershed
24	Moanalua Watershed
25	Kaloi Watershed
26	Makaiwa Watershed
27	Ulehawa Watershed
28	Kamaileunu Watershed
29	Wailele Watershed
30	Honouliuli Watershed
31	Kahawai Watershed
32	Kaipapau Watershed
33	Kamilonui Watershed
34	Oio Watershed
35	Paumalu Watershed
36	Ahuimanu Watershed

**Table 1 (con't)**  
**Prioritized Areas for Inspection**

<b>Priority</b>	<b>Area (Watershed)</b>
37	Kahaluu Watershed
38	Kalunawaikaala Watershed
39	Kamiloiki Watershed
40	Kawela Watershed
41	Keamanea Watershed
42	Koko Crater Watershed
43	Makaleha Watershed
44	Makauao Watershed
45	Makiki Watershed
46	Pahole Watershed
47	Punaluu Watershed
48	Haiamoa Watershed
49	Waimea Watershed

**INSPECTIONS**

Inspections of sites will be scheduled in accordance with quotas contained in the Oahu MS4 NPDES permit, as provided in Table 2. Due to scheduling constraints, the inspections for Year 1 were initiated prior to submitting this prioritization plan.

**Table 2**  
**Inspection Quota for the Industrial and Commercial Discharge Management Program**

<b>Oahu MS4 NPDES permit Year</b>	<b>Minimum Number of Inspections</b>
1	20
2	30
3	40
4	60
5	80

Details on the inspection and investigation process for the Industrial Discharge Program are provided in the *Industrial and Commercial Inspection Plan*, which will be submitted to HDOH by March 2007.